

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

VOTER REFERENCE FOUNDATION,)	
LLC and HOLLY STEINBERG)	CASE NO: 1:22-cv-00222-JB-KK
)	
Plaintiffs,)	
v.)	
)	
)	SUPPLEMENTAL
HECTOR BALDERAS , in his official)	JOINT STIPULATIONS
capacity as New Mexico Attorney General, and)	
MAGGIE TOULOUSE OLIVER , in her)	
Official capacity as New Mexico)	
Secretary of State,)	
)	
Defendants.)	

**SUPPLEMENTAL JOINT STIPULATIONS FOR HEARING ON
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

COME NOW Plaintiffs Voter Reference Foundation, LLC ("VRF") and Holly Steinberg and Defendants Secretary of State Maggie Toulouse Oliver and Attorney General Hector Balderas (collectively, the "Parties"), by and through counsel, and stipulate to the following:

1. The Secretary of State's Office sent a referral to the Attorney General's Office on or about December 20, 2021 regarding Local Labs and VRF. The copy of that referral included in the Parties' May 16, 2022 stipulations was incomplete. A true and correct copy of the referral and all exhibits thereto is attached as Exhibit C-1.

2. The Secretary of State's Office has made a second referral to the Attorney General's Office in 2022 relating to voter data. The copy of that referral included in the Parties' May 16, 2022 stipulations was incomplete. A true and correct copy of the referral and all exhibits thereto is attached as Exhibit L-1.

3. The Parties stipulate to the authenticity and admissibility of the documents attached hereto as Exhibits C-1 and L-1. Each Party reserves the right to argue that appropriate weight should be given to the documents subject to this stipulation.

Respectfully submitted this 24th day of May 2022.

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